

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF

ANGELA RAGGS,

DEBTOR

IN PROCEEDINGS
UNDER CHAPTER 13

CASE NO. 20-17876

JUDGE: Cox

NOTICE OF FILING

Notified via Electronic Filing

Tom Vaughn, 55 E. Monroe Street, Suite 3850, Chicago, IL 60603

David M Siegel, David M. Siegel & Associates, 790 Chaddick Drive, Wheeling, IL 60090

Notified via US Postal Service

Angela Raggs, 1247 N Massasoit Ave, 1st Floor, Chicago, IL 60651-1120

Please take notice that on the 29th day of October, 2020 I did file with the Clerk of the United States Bankruptcy Court, 219 S Dearborn, Chicago, IL 60604 the Objection to Confirmation of Plan.

AFFIDAVIT OF SERVICE

The undersigned hereby certifies that he/she caused a true and correct copy of the above and foregoing document to be sent to the Debtor at the address listed below. Said copy was placed in an envelope addressed as listed below and placed in the U.S. Mail on October 29, 2020, with first class postage prepaid. All other parties entitled to notice received such notice electronically, through the office of the Clerk of the Court.

Respectfully Submitted,

/s/ Michael N. Burke
Richard B. Aronow 3123969
Michael N. Burke 6291435
Mike Kalkowski 6185654
Shapiro Kreisman & Associates, LLC
2121 Waukegan Road, Suite 301
Bannockburn, IL 60015
(847) 291-1717
Attorneys for Movant
20-094173

The firm of Shapiro Kreisman & Associates, LLC is a debt collector. This is an attempt to collect a debt. Any information may be used for that purpose. If your personal liability for this debt has been extinguished, discharged in bankruptcy or if a court order prohibits collecting this debt from you personally, then this is an attempt to enforce the Movant's rights with respect to the property addressed herein, and it is not an attempt to collect the debt from you personally.

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF

ANGELA RAGGS,

DEBTOR

IN PROCEEDINGS

UNDER CHAPTER 13

CASE NO. 20-17876

JUDGE: Cox

OBJECTION TO CONFIRMATION OF THE PLAN

NOW COMES the Movant, Nationstar Mortgage LLC d/b/a Mr. Cooper, by and through its attorneys, Shapiro Kreisman & Associates, LLC, and states as follows:

1. This case was filed on September 29, 2020. On September 29, 2020 Debtor filed a plan.
2. Movant, a secured party in interest, holds a note (or services a loan) secured by a mortgage on the real property located at 1247 N Massasoit Ave, Chicago, IL 60651 dated September 1, 2012.
3. The pre-petition arrearages due the Movant total \$844.47.
4. The Debtor's plan provides that the Trustee is to pay the Movant \$0.00 as and for its arrearage claim.
5. The proposed plan impermissibly modifies the rights of Movant to receive all funds due it, thereby violating 11 U.S.C. §1322(b)(2) and 11 U.S.C. §1322 (b)(5).
6. Additionally, the proposed plan provides for total funding in the amount of \$36,660.00 over the life of the plan with estimated payments to the Trustee in the amount of \$36,660.00. As the arrears payable to Movant are understated by \$844.47, the plan is underfunded and unfeasible on its face.
7. Such violations render the plan unconfirmable as a matter of law.

WHEREFORE, Nationstar Mortgage LLC d/b/a Mr. Cooper prays that
confirmation of the plan be denied and for such other relief as the Court deems just.

Respectfully submitted,

/s/ Michael N. Burke
Attorney for Nationstar Mortgage LLC d/b/a Mr.
Cooper

Richard B. Aronow 3123969
Michael N. Burke 6291435
Mike Kalkowski 6185654
Shapiro Kreisman & Associates, LLC
2121 Waukegan Road, Suite 301
Bannockburn, IL 60015
(847) 291-1717
Attorneys for Movant

The firm of Shapiro Kreisman & Associates, LLC is a debt collector. This is an attempt to collect a debt. Any information may be used for that purpose. If your personal liability for this debt has been extinguished, discharged in bankruptcy or if a court order prohibits collecting this debt from you personally, then this is an attempt to enforce the Movant's rights with respect to the property addressed herein, and it is not an attempt to collect the debt from you personally.

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF

ANGELA RAGGS,

DEBTOR

IN PROCEEDINGS
UNDER CHAPTER 13

CASE NO. 20-17876

JUDGE: Cox

ORDER DENYING CONFIRMATION OF THE PLAN

THIS CAUSE, coming on to be heard on the Objection to Confirmation of the Debtor's Plan filed by Nationstar Mortgage LLC d/b/a Mr. Cooper, the Court having jurisdiction and being advised in the premises, and due notice having been given;

IT IS HEREBY ORDERED that confirmation of the plan is denied.

Dated:_____

Entered:_____
Bankruptcy Judge

Richard B. Aronow 3123969
Michael N. Burke 6291435
Mike Kalkowski 6185654
Shapiro Kreisman & Associates, LLC
2121 Waukegan Road, Suite 301
Bannockburn, IL 60015
(847) 291-1717
Attorneys for Movant
20-094173